

Open Government Plan

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MILLENNIUM
CHALLENGE CORPORATION

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1. Introduction

This document sets forth the Millennium Challenge Corporation's (MCC) 2012 plan for promoting transparency, participation, and collaboration in all aspects of its work to reduce poverty through economic growth. MCC's Open Government Plan (OGP) has been developed in accordance with the Open Government Directive issued by the Executive Office of the President, Office of Management and Budget on December 8, 2009.¹ MCC has advanced its mission, to reduce poverty through investments promoting economic growth in developing countries with sound policy environments, by signing large-scale grant agreements called Millennium Challenge Compacts with 25 countries totaling approximately \$9.3 billion. MCC also has signed 23 threshold programs, which are smaller grants focused on policy reform with countries that do not yet qualify for compact funding. MCC-funded projects produce quantifiable results that improve the lives of the poor in practical and meaningful ways.

Since its inception, MCC has been at the forefront of foreign assistance. MCC provides the public with data and insights on MCC's decision-making, program management, and policy assessments through posting criteria for country selection, economic analysis, and project evaluation information on its public website; participation in the U.S. Government's Foreign Assistance Dashboard; public events; press interactions; and participation in the global development initiatives of the Obama Administration and the global development community.

MCC's 2012 OGP builds upon efforts, accomplishments, and lessons learned from its 2010 OGP, including setting an ambitious course of action for the Agency focused on bringing increasing amounts of MCC data into the public domain. MCC achieved success in meeting OGP goals related to participation and leadership in a variety of public data forums, such as *Data.gov*, Foreign Assistance Dashboard, and *USAspending.gov*. Due to unforeseen obstacles, MCC did not reach targets set forth in its 2010 OGP flagship initiative, which aimed to publish 50 high value data sets from MCC's impact evaluations—notably concerns around the privacy of MCC's beneficiaries. MCC's 2012 OGP not only builds on its 2010 flagship initiative based on lessons learned and also sets more realistic and attainable goals.

MCC's 2012 OGP reflects input from MCC senior leadership, staff, interested stakeholders, and members of the public. MCC personnel understand the importance of open government and the value that transparency, participation, and collaboration bring to MCC's work. MCC believes that broad participation, socialization, and ownership of the OGP commitments in the 2012 OGP will contribute to achieving the Agency's goals.

2. Access to Quality Information on MCC and its Work

This section includes information on how MCC provides the general public with access to quality information on all aspects of MCC's work. Among other things, this section describes MCC's online publishing policies, the wide-ranging information available at MCC's public website, the format in which that information is provided, and the process by which the quality of all such information is monitored.

¹ A copy is available at http://www.whitehouse.gov/omb/assets/memoranda_2010/m10-06.pdf.

2.1 Publishing Information Online

MCC fully utilizes the vast capacity and reach of online information sharing. Visitors to MCC's public website (www.mcc.gov) can access information that shows economic rates of return calculations, performance indicator tracking tables, and impact evaluation summaries for MCC-funded projects. Data on beneficiary analyses are also available. MCC posts to its public website all signed compacts, quarterly status reports on worldwide programs, information on program-related procurement opportunities, and reports and notices provided to Congress. A more detailed summary of some of the transparency-supporting information available on MCC's public website is provided in the *"Appendix"* to this report.

2.1.1 Publication in an Open Format

MCC proactively uses modern technology to publish information. In alignment with the Open Government Directive and MCC's goals to provide high-value data to be used by the general public, businesses, education institutions, and other government agencies, MCC conforms to industry and Agency best practices in regards to open format standards. Content available through MCC's public website is searchable, can be indexed and downloaded, and is available in formats that are accessible through any modern Web browser or freely available software/plugin (such as *Adobe Acrobat*) that are used throughout the U.S. Government and by the public. MCC's goal is to make published information consumable and easy to use. MCC also is working toward ensuring access to its data from any device and any location.

2.1.2 Publication of High-Value Data Sets

In response to the Open Government Directive, MCC identified and published three high-value data sets online in January 2010. MCC plans to include additional data sets through its open government process both on MCC's public website as well as on Data.gov, particularly as an increased number of impact evaluations are completed. Posting these data sets on MCC's public website provides researchers the opportunity to replicate the results of MCC's evaluators or to conduct further studies. MCC's 2010 OGP set out an ambitious goal of publishing an additional 50 high value data sets from impact evaluations. This goal proved unattainable due to the need to first establish a privacy protection plan to ensure the anonymity of beneficiaries in keeping with international standards, and subsequent internal Agency protocols and procedures for clearing MCC data for publishing. Currently, MCC is taking steps to make high value data sets available, including identifying a Data.gov point of contact to coordinate and manage publication of MCC data and developing a privacy protection plan.

2.1.3 Open Government Webpage

Once the preceding protocols are put in place, MCC will submit the privacy protection plan to an Institutional Review Board for internal review and approval. Once the privacy protection plan has been established, MCC plans to include additional data sets both on MCC's public website and on Data.gov Open Government Webpage.

MCC's open government webpage can be found at www.mcc.gov/open. This webpage highlights MCC's emphasis on transparency and details compliance with the Open Government Directive. The content of this webpage will be regularly refreshed and expanded as MCC further advances the ideals of open government; currently, the webpage features MCC's 2010 OGP and links to MCC's website's monitoring and evaluation section, economic rates of return data, quarterly status reports, impact evaluations data, and a results overview page.

MCC's open government webpage is interactive and user-friendly. It allows users to download datasets (including those described in "[2.1.2 Publication of High-Value Data Sets](#)" above) and includes a feedback mechanism that allows users to submit comments, suggestions, or questions on MCC's open government initiatives. The large feedback button on the top of the page allows the public to send input to MCC via a Web form that goes into a mailbox managed by MCC's Director of Web Projects. Messages regarding MCC's OGP or open government webpage are directed to the designated open government representative in MCC's Department of Congressional and Public Affairs for processing and response as appropriate. This feedback link is in addition to the "Contact MCC" link at the bottom of the every page of MCC's public website, which allows the public to contact MCC directly via an e-mail Web form and provides the public with phone numbers and addresses of MCC's headquarters.

MCC's open government webpage is the responsibility of MCC's Vice President for Congressional and Public Affairs, who will oversee management of the webpage's content and will ensure the webpage's compliance with the Open Government Directive.

2.2 Quality of Government Information

MCC will ensure that information on its public website, including its open government webpage, conforms to Office of Management and Budget (OMB) guidance on information quality and that adequate systems and processes are in place within MCC to promote such conformity.

3. MCC's Open Government Plan: Advancing Transparency, Participation, and Collaboration

The Directive requires MCC to designate a high-level senior official to be accountable for the quality and objectivity of, and internal controls over, publicly-disseminated spending information. This official is MCC's Vice President for Administration and Finance.

This section describes MCC's plans to maintain its commitment to transparency, conform to recent USG and global transparency initiatives, expand its efforts to promote participation of internal and external parties, and build on its already-extensive practice of collaboration. As discussed below, transparency, participation, and collaboration are the critical organizational themes of MCC's OGP.

3.1 Transparency

Since its inception in 2004, MCC has embraced openness in its work and has challenged itself to provide as much information as possible to the public. To pursue its global poverty reduction goals, MCC relies on funds appropriated from Congress. MCC firmly believes that U.S. taxpayers deserve to know how their

taxpayer dollars are being used and should be given the opportunity to provide feedback on how MCC can be even more effective.

As discussed in more detail below, MCC strives to go beyond what it is legally required to publish, so that the public is provided with information on all aspects of MCC activities. MCC responds promptly to all Freedom of Information Act (FOIA) requests and has no backlog. MCC also convenes regular meetings with the public to share information on MCC's programs and corporate governance, and makes MCC's Chief Executive Officer (CEO) and other senior officials available for press interviews, policy discussions and debates, and public events.

3.1.1 Review of Current Dissemination Obligations

3.1.1.1 MCC's Statutory Requirements and General Practices

MCC is subject to certain specific statutory requirements for the dissemination of information on its programs and activities. These express statutory requirements ensure that information on much of MCC's business is posted on MCC's public website, published in the *Federal Register*, or both.

MCC annually publishes in the *Federal Register* a list of those countries that may become eligible for MCC development assistance, as well as those countries that are ultimately selected as eligible (as required under 22 U.S.C. § 7707). In addition, MCC publishes the criteria and methodology for selecting eligible countries annually in the *Federal Register* and on MCC's public website (as required under 22 U.S.C. § 7707(d)).

Once a Millennium Challenge Compact is signed with a partner country, the grant agreement and related documents are published in the *Federal Register*, as well as on MCC's public website (as required under 22 U.S.C. § 7709(b)). Compacts must disclose the intended beneficiaries, a multi-year financial plan, details with respect to the participation of other international donors, and other similar program requirements (as required under 22 U.S.C. § 7709).

MCC also publishes in the *Federal Register*, on a quarterly basis, the financial details of all grant disbursements and any funds transferred to other federal agencies (as required under 22 U.S.C. § 7711). MCC provides Congress with annual reports covering MCC activities by March 31 of each year; this report is posted on MCC's public website and is distributed to key external stakeholders, including those in other U.S. Government agencies, the private sector, non-governmental organizations (NGOs), the diplomatic community, and think tanks. Any member of the public may request a hard copy of the report through the "Contact MCC" link on MCC's public website or by calling the Department of Congressional and Public Affairs at 202-521-3850 (this phone number is also provided on MCC's public website). Hard copies are also available throughout MCC headquarters and at MCC public outreach events.

Beyond these specific legal publication requirements and as a matter of policy, MCC makes available much of its work product. Press releases highlight activities and decisions of MCC's Board of Directors, any significant changes to compacts, and agreements with other donors or private sector entities. Significant MCC operational policies, such as the "Policy on Suspension and Termination" and the "Policy on Preventing, Detecting and Remediating Fraud and Corruption in MCC Operations," are posted on

MCC's public website. All formal notifications or official testimony to Congress regarding MCC programs are posted on MCC's public website.

3.1.1.2 Other Statutory or Regulatory Transparency Requirements

With respect to the requirements of the Administrative Procedures Act, because MCC exercises no regulatory authorities, it does not engage in the formal rule making procedures of that act. However, with respect to the act's FOIA provisions, the Agency does have an active program with a FOIA regulation published in the Code of Federal Regulations (22 C.F.R. § 1304) and posted on its public website to comply with the Electronic Freedom of Information Amendments of 1996.

All contracting opportunities with respect to MCC's programs are published on MCC's public website to ensure the widest possible dissemination (note that these are procurements not covered by the Federal Acquisition Regulation). MCC publishes all non-compact grants at the federal Grants.gov website.

Finally, with respect to the requirements of the Data Quality Act, MCC is currently developing a formal procedure to comply with OMB's guidelines on "Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies." MCC expects to implement these procedures by the second quarter of fiscal year 2013.

3.1.2 Embracing and Advancing Transparency

MCC endeavors to be as transparent as possible in its work to reduce poverty through economic growth and is at the forefront of delivering foreign aid openly and transparently. As noted in Section 2.2 and as described in more detail in the *"Appendix"*, MCC's public website offers visitors extensive information on MCC's programs, policies, processes, and activities. To increase public knowledge and to promote scrutiny of its work, MCC features available data prominently on its public website, holds public events describing the data, and highlights data in publications. MCC invites feedback, comments, and questions on this data via its public website, and responds to questions and comments from the public quickly and comprehensively.

MCC is committed to transparency based on the belief that making information public is a cornerstone of accountability and of supporting country ownership. With a mandate for transparency since its inception, MCC makes public its selection indicators and countries' annual performance on them, and for all compact programs MCC publishes five-year budgets, cost-benefit analyses, projected outcomes, financial and program monitoring data, and results of independent impact evaluations once programs are complete. This approach was recognized in the 2011 Publish What You Fund Transparency Index, in which MCC scores first among USG agencies, and seventh out of 58 donor countries and agencies globally.

MCC has been a leader among USG agencies in making information available on the USG Foreign Assistance Dashboard (www.foreignassistance.gov), as the first agency beyond USAID and the Department of State to add data, and the first agency to publish obligation and expenditure data. As part of MCC's 2012 OGP, MCC plans to provide project-level descriptions and narratives to the Dashboard. These efforts position MCC well to comply with USG commitments under the International Aid Transparency

Initiative, to which the USG became a signatory in December 2011. Going forward, MCC has made an institutional commitment to match its cutting-edge data *availability* with improvements to make the data that MCC publishes even more *findable and usable*.

In the spirit of this commitment to transparency, an internal working group was formed by senior leadership to address opportunities to enhance transparency efforts, ensuring that MCC remains a leader in the development field. The working group first completed a baseline analysis comparing MCC's transparency efforts with other governmental and non-governmental institutions. Furthermore, the group reviewed analysis by external groups and non-governmental organizations supporting aid transparency efforts. The analysis revealed that while MCC scores high in making information *available* to the public, it has been overtaken by a growing number of donors, projects, and initiatives that have found new ways to improve the *usability* of large amounts of project and results data.

This conclusion has been incorporated into the initiatives identified in MCC's 2012 OGP, specifically regarding the enhancements planned for MCC's public website, and the decision to better visualize MCC project and results data. Such efforts will allow MCC to remain on par with the interactive and visualization capabilities of other organizations, including the World Bank.

3.1.3 Underlying Data for Electronic Information

One of MCC's distinguishing features is using data-based country selection criteria, and its benefit-cost analysis and impact evaluations to assess the effects of its programs on economic growth and poverty reduction, both before and after programs are implemented. These analyses include extensive calculations based on underlying data. MCC currently makes public through its website the underlying data and calculations used in its selection process and in the economic rate of return analyses conducted before programs are implemented (see Section d of the [Appendix](#) for more details). In addition, as compacts are completed, MCC has been and will continue to post on its public website the survey data used in its independent evaluations once the data are reviewed for accuracy and verified for appropriate anonymity. These datasets will offer users a clear understanding of the impacts expected in funding each program and an assessment of whether the program actually led to these impacts.

The datasets also provide valuable information to policymakers considering funding similar or related investments, researchers seeking to replicate or build upon the analysis, and individuals and organizations in MCC's partner countries ensuring that MCC's evaluations accurately reflect conditions in these countries. To do so, these audiences require disaggregated data, as well as the detailed methodology used to collect and analyze these data. Thus, MCC will provide the data in as raw a form as possible, accompanied by documentation and transparent analytical methodologies.

3.1.4 MCC's Compliance with Transparency Guidance

MCC is reviewing *Data.gov*, the *IT Dashboard*, *Foreign Assistance Dashboard*, and *USAspending.gov* websites to determine the most effective presentation for MCC data on these websites.

- ★ **Data.gov**—MCC will provide historical and current disbursement and obligation data for program and administrative funds by fiscal year. Program data will be provided down to the activity level, and administrative data by relevant budget categories.
- ★ **IT Dashboard**—MCC will prepare its OMB Exhibit 300 and Exhibit 53 data for major systems initiatives and infrastructure support by September 30, 2012. The completed exhibits will be uploaded to the IT Dashboard. This has not been done in the past due to the small size of MCC and MCC's typical IT projects and IT budget; however, senior management has now committed to provide this information.
- ★ **Foreign Assistance Dashboard**—MCC will continue to provide quarterly financial data to the Dashboard team and work to become the first USG agency to provide project data to the Dashboard, providing project descriptions and narratives.
- ★ **USAspending.gov**—MCC information on contracts, grants, and cooperative agreements is available at USAspending.gov.

3.1.5 Informing the Public of Significant Actions

MCC frequently and consistently informs the public of significant actions and business of MCC through a variety of mechanisms, including:

3.1.5.1 Public events

- ★ **Monthly public events**—MCC hosts or partners with another organization to host an event open to the interested public at least once a month. The topics and speakers vary depending on current events and activities at MCC. MCC past event topics include: gender policy; food security; activities in Cape Verde (featuring the Prime Minister of Cape Verde); global health; impact evaluation results from MCC's Burkina Faso schools program; and "Doing Business with MCC" procurement conferences. An archive of all MCC events, including transcripts and video (where available), is available on MCC's public website. In April 2012, MCC hosted Publish What You Fund, a leading aid transparency non-governmental organization, to discuss their pilot Aid Transparency Index and to provide an external critique of MCC's transparency efforts.
- ★ **Quarterly public events**—Following each quarterly meeting of the MCC Board of Directors, MCC hosts a public meeting at which MCC's CEO provides an overview of the meeting discussion and takes questions from the public. These meetings usually include a question and answer session with a panel of MCC senior staff.
- ★ **Development of strategic collaborations**—MCC regularly meets with the donor community, NGOs, and business associations to publicize its work and to develop innovative methods of collaboration and synergy. These interactions are conducted through direct work sessions, forums, or special events dedicated to the specific areas of expertise that MCC offers.

3.1.5.2 Press/Media Relations

- ★ **Press releases**—on average, MCC issues over 50 press releases each year to announce major Agency milestones, publications, and events. MCC always issues press releases after quarterly MCC Board of Directors meetings and after compact and threshold agreements are signed.
- ★ **Interviews and articles**—MCC regularly responds to press inquiries and requests for interviews, and proactively reaches out to media outlets to publicize information about MCC activities. Articles referencing or quoting MCC representatives are posted on MCC's public website. MCC also authors opinion and editorial pieces to highlight MCC activities and interests in connection with U.S. and international newspaper audiences.

3.1.5.3 MCC's Public Website

- ★ As noted throughout this OGP, MCC's public website contains a wealth of information, including: procurement opportunities; monitoring and evaluation data; impact evaluations; country eligibility indicators; quarterly status reports on MCC compact and threshold programs; congressional notifications; and country eligibility indicators. As one of its four OGP initiatives, MCC plans to make the data on its website more accessible.

3.1.5.4 Electronic Publications

- ★ **Bi-weekly success stories**—MCC issues short stories that highlight the impact of MCC programs on individual lives, communities, and infrastructure in MCC partner countries. Stories are e-mailed to members of the public who have signed up to receive the stories and are posted on MCC's public website.
- ★ **Monthly e-newsletter**—MCC produces a monthly electronic newsletter that highlights MCC news and activities from the previous month, which is e-mailed to members of the public who have signed up to receive the newsletters and is posted to MCC's public website.
- ★ **Blogs**—MCC's public website hosts two blogs—(i) MCC's CEO authors a blog on MCC programs and results; and (ii) the "Poverty Reduction Blog," authored by MCC staff and other special guest writers from around the globe, offers firsthand accounts of the impact of MCC programs.

3.1.5.5 Print Publications

- ★ **Quarterly newsletter**—MCC produces the quarterly newsletter, *Milestones*, which highlights major achievements, project descriptions from countries around the world, and staff perspectives on MCC programs. *Milestones* is posted in .pdf format on MCC's public website at the end of each fiscal quarter and is available in hard copy at MCC events and throughout MCC headquarters.
- ★ **Principles into Practice Series**—MCC was founded with a focused mandate to reduce poverty through economic growth. MCC's model is based on a set of core principles that are essential for development to take place and for development assistance to be effective—good governance, country ownership, focus on results, and transparency. The Principles into Practice Series offers a frank look at what it takes to make these principles operational. The experiences captured in this series informs MCC's ongoing efforts to refine and strengthen its model, and allows other development professionals

and organizations to benefit from and build on the lessons MCC has learned through events and discussions supporting the Principles Into Practice papers.

- ★ MCC publishes a variety of documents highlighting the Agency’s work, including:
 - * Annual Reports
 - * Congressional Budget Justifications
 - * Brochures on MCC’s activities in Africa, Europe, Asia and the Pacific, and Latin America
 - * Factsheets on each country and on sector specific topics (<http://www.mcc.gov/pages/activities>), including:

<ul style="list-style-type: none"> ◇ <u><i>Aid Effectiveness</i></u> ◇ <u><i>Anti-Corruption</i></u> ◇ <u><i>Beneficiary Analysis</i></u> ◇ <u><i>Democracy</i></u> ◇ <u><i>Economic Rates of Return</i></u> ◇ <u><i>Environment</i></u> ◇ <u><i>Food Security</i></u> ◇ <u><i>GenderHealth</i></u> ◇ <u><i>HIV/AIDS</i></u> 	<ul style="list-style-type: none"> ◇ <u><i>Impact Evaluation</i></u> ◇ <u><i>MCC in Africa</i></u> ◇ <u><i>MCC in Europe, Asia, and the Pacific</i></u> ◇ <u><i>MCC in Latin America</i></u> ◇ <u><i>Monitoring and Evaluation</i></u> ◇ <u><i>Press Freedom</i></u> ◇ <u><i>Private Sector Initiatives</i></u> ◇ <u><i>Water & Sanitation</i></u>
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3.1.5.6 Social Media

- ★ **Adobe Connect web chats**—MCC has hosted several web chats over the years and plans to continue the practice. The web chats feature MCC experts and staff with topics ranging from investments made in the water sector to private sector engagement. Web chats are open to the public, and transcripts will be posted to MCC’s public website.
- ★ **Facebook**—MCC uses a *Facebook fan page* to post information on MCC activities, photos, and video, and to solicit public comment from users. The MCC Facebook page has over 2,000 fans to date.
- ★ **Twitter**—MCC shares high profile tidbits of information on MCC activities and mentions by public figures at *@MCC Tweets*. MCC Tweets has over 6,000 connections to date.
- ★ **YouTube and iTunes**—MCC has channels on YouTube, “*milleinniumchallenge*”, and an iTunes video podcast, “*MCC Podcasts*”, allowing the public to view videos of MCC public events and interviews with MCC officials. MCC has 49 videos uploaded, 67 subscribers, 11,011 video views on YouTube and 76 videos with 10,969 views since November 2011 on iTunes.

To maximize the information that reaches the public, MCC employs a variety of these outreach mechanisms to spread the news of key MCC events. For example, for every compact agreement signing, MCC invites the public to an outreach event with the partner country, issues a press release on the compact, publishes and posts a factsheet on the compact, tweets from the signing ceremony, posts photos and information on MCC’s public website and Facebook page, and often makes senior officials available for media interviews.

Additionally, MCC maximizes visits from its field personnel to Washington, DC to engage in outreach activities with the public through general or targeted country-based events.

3.1.6 MCC's Records Management Requirements

MCC has a dedicated, full-time records officer who has trained MCC staff on federal records administration and, in particular, the requirements of the National Archives and Records Administration's General Schedule of Records for routine administrative records. MCC submitted and received approval on its agency-specific Records Disposition Schedule. MCC will begin implementing additional records training and disposition rules across all departments and in all formats by the end of FY 2012.

3.1.7 MCC Process on FOIA Requests

MCC's FOIA webpage (<http://www.mcc.gov/foia>) includes links for all FOIA reporting, including information on how to submit a FOIA request, an "electronic reading room," and the Department of Justice's (DOJ) FOIA Act Guide. MCC meets or exceeds the regulatory standard for responding to FOIA requests, as reflected in MCC's annual FOIA report for 2011, submitted to DOJ on January 25, 2012.

MCC's Office of the General Counsel is responsible for processing all FOIA requests. FOIA requests can be sent to MCC's Chief FOIA Officer at:

Millennium Challenge Corporation
ATTN: Chief FOIA Officer John Mantini
875 Fifteenth Street, N.W.
Washington, DC 20005

Upon receipt and review of a FOIA request, staff in MCC's Office of General Counsel prepares the Agency response by gathering information and input from other MCC departments. MCC's Chief FOIA Officer reviews and approves all responses prior to their release. To date, there have been no administrative appeals or litigation regarding denied FOIA requests. Any appeal would be directed to MCC's General Counsel for decision.

On March 18, 2010, MCC submitted its Chief FOIA Officer's report as required by the Attorney General's FOIA Guidelines. This report highlights MCC's efforts to improve FOIA processes and strategies to address backlogs in FOIA requests. MCC has no FOIA request backlog; however, MCC highlighted efforts to proactively provide information to FOIA requesters, including two instances in which MCC provided information to requesters even though MCC was not legally obligated to release the information.

MCC established a FOIA "electronic reading room" to provide the public with electronic access to certain previously released documents. Because MCC is required by law to withhold the release of certain information primarily related to government contracts, including bid and business proprietary information, some documents or parts of documents cannot be released to the public. MCC's electronic reading room currently includes policies, procurement guideline documents, and selection criteria and methodology reports.

3.1.8 MCC's Process on Congressional Information Requests

Congressional information requests to MCC are processed by MCC's Department of Congressional and Public Affairs (CPA), which is managed by a Vice President responsible for leading MCC's development of congressional priorities and strategy for keeping MCC senior staff and key internal and external stakeholders informed of congressional developments. CPA's congressional affairs team consists of five staff members: (i) Managing Director of Congressional Affairs; (ii) Associate Director (oversees MCC's Senate relations); (iii) Senior Legislative Officer (oversees House of Representatives relations); (iv) Legislative Officer; and (v) a Legislative Assistant.

As MCC's primary liaison with Congress, CPA coordinates a variety of materials, including: requests for submission of proposed testimony, the Congressional Budget Justification, Questions for the Record, and other requests from members of Congress, their staff, or committee staff. CPA coordinates MCC clearance of executive branch testimony relating to MCC and of proposed legislation received from OMB or the Department of State.

CPA is responsible for submitting congressional notifications and reports as required by MCC's statute, and ensures that they are posted on MCC's public website. CPA also manages requests for information received in writing, by e-mail, or by phone, in a timely manner. Requests for information and congressional correspondence addressed directly to MCC's CEO are managed through MCC's Executive Secretariat to ensure a timely and comprehensive response.

MCC staff advise CPA in advance of any proposed meetings with congressional members or staff. CPA attends congressional meetings along with appropriate MCC sector or regional staff, and shares a readout of meetings with relevant MCC staff.

3.1.9 Declassification

MCC approved a declassification program in 2011.

3.1.10 Participation

MCC values public input and is dedicated to expanding opportunities for the public to participate in MCC's work. The preceding section describes some of MCC's efforts to welcome the public as participants in MCC's work, including outreach events, post-MCC Board of Directors meeting recaps and discussions, and social media access. This section provides further information on MCC's work to expand participation.

3.1.10.1 Public Participation Channels

MCC's open government webpage incorporates a mechanism for the public to provide feedback on and to assess the quality of published information, and also to provide input on which information to prioritize for publication.

Through the “Contact MCC” link on MCC’s public website, the public can: (i) submit an e-mail request for information; (ii) find the Agency’s mailing address and phone numbers, including for press, public, and congressional affairs staff; and (iii) sign up to receive e-mail updates, invitations, and information from MCC.

The “Contact MCC” feature also includes information on how the public can report allegations of fraud to MCC, or directly to the Office of the Inspector General that oversees MCC. MCC’s Department of Compact Operations built on its existing efforts to remediate fraud and corruption by formally adopting a “Policy on Preventing, Detecting and Remediating Fraud and Corruption in MCC Operations.” This policy is published on MCC’s public website in English, French, Portuguese, and Spanish. As of February 2012, training on awareness and prevention of fraud and corruption has been provided in twelve countries. As a result of this training and related work in compact countries, five anti-fraud and corruption action plans have been completed by local Millennium Challenge Account (MCA) entities,² approved by MCC and the relevant MCA Boards of Directors, and posted on MCA websites. Additional action plans are being developed and reviewed. Section k of the Appendix provides more information on MCC’s anti-fraud and corruption initiative.

3.1.10.2 Speakers Bureau

Through the Speakers Bureau page on MCC’s public website (<http://www.mcc.gov/pages/about/speakers-bureau>), the public can request an MCC speaker to participate in outside public events or meetings, and also request a briefing at MCC’s offices.

3.1.10.3 Procurements

MCC values broad participation in MCC-funded procurements. To advance this, MCC provides extensive information on procurement opportunities on MCC’s public website (described in the “Program Procurements” section of the Appendix). The Contracts and Procurements page of MCC’s public website (<http://www.mcc.gov/pages/business>) allows the public, through a Web form, to submit procurement-related questions or comments to MCC procurement officials. The questions or comments are forwarded to the Senior Director of Procurement, who assigns a member of the procurement team to respond to the questions. Feedback comments, depending on the subject matter (i.e., comments on the procurement guidelines or comments on the standard bidding documents) are provided to the appropriate internal MCC working group for consideration during the next revision of the documents. The policies, procedures, and documents used by the procurement staff of each MCA entity are refined on a continuous basis based on lessons learned from the field, comments from industry and the public, and MCC experience with implementing compact projects.

MCC compact agreements require that MCA entities develop a website of their own. This website provides the public with specific and more detailed information on the structure and governance of the respective MCA program. The MCA website also tracks the progress of the compact program and provides information on key procurements, decisions, and media events at the project level. MCC’s public website provides links to each of the MCA websites. The public, in the U.S. and in MCC partner countries,

² The partner country entities implementing MCC compacts.

is encouraged to contact the MCA entities directly and to provide feedback to MCAs via their individual websites.

3.1.10.4 New Feedback Mechanisms

MCC has implemented new feedback mechanisms that further enhance public participation and involvement in MCC activities.

- ★ **Webchats**—MCC is expanding its capacity to host public webchats, which will allow greater dialogue between MCC and the public beyond MCC’s headquarters in Washington, DC.
- ★ **Continuous public comment site**—MCC makes available multiple public engagement mechanisms by which users may comment directly, including contact and feedback forms on mcc.gov, and MCC’s Facebook wall and Twitter feed.

3.2 Collaboration

MCC has a new approach to development assistance; consequently, MCC has been contributing its analysis and evaluations to the public domain for the benefit of other donors, academics, NGOs, and others. MCC actively pursues collaboration with these key stakeholders and other interested parties. By leveraging each other’s strengths and identifying areas in which collaboration can maximize impact, MCC and these partners are finding new ways to advance global poverty reduction.

3.2.1 MCC’s Existing Collaboration Efforts

The composition of MCC’s Board of Directors (Board) is the most formal and significant evidence of the Agency’s collaboration with member agencies and private sector representatives. As described on MCC’s public website and as set forth in MCC’s governing legislation, MCC’s Board includes five government members: (i) the Secretary of State (Chair); (ii) the Secretary of the Treasury (Vice Chair); (iii) the Administrator of USAID; (iv) the U.S. Trade Representative; and (v) MCC’s CEO. The Board also includes four private sector members nominated by the President and confirmed by the Senate. Each private sector Board member serves an initial three-year term and may be nominated to serve a second term of two years. The majority and minority leaders of each house of Congress submits a list of recommended nominees to the President, and the President makes the nominations from the lists. Private sector board members usually have experience as senior government officials, NGO leaders, or private sector businesspersons, and generally have experience with developing country issues.

The fundamental element of MCC’s collaborative approach to fulfilling its mission is its working relationship and interaction with the partner countries. MCC asks partner governments to maintain a meaningful public consultative process throughout compact development and implementation. This allows civic, private, and political sector actors to play meaningful roles in setting priorities for the development of a country, and has empowered elected officials to exercise their representative rights and responsibilities. During implementation, civil society representatives participate directly in governing and advisory boards that oversee implementation of MCC compact programs.

This collaborative approach is reflected in the information that MCC makes public about MCC's partner country programs. MCC's public website includes a country page for each of MCC's partner countries. Compact country webpages include: an overview of the compact; descriptions of compact projects; information on the MCA entity; a link to the MCA entity's website; MCC and MCA contact information; all the monitoring and evaluation data for the compact projects; and a link to all documents on MCC's public website related to the country (quarterly status reports, annual scorecards, success stories, etc.) MCC is in the process of updating MCC's Threshold Program country pages to include more detailed descriptions of the Threshold Program's objectives, activities, results to date, and available evaluation reports. With the recent re-launch of MCC's Threshold Program, this is expected to be an ongoing effort with significant progress being achieved during FY 2013.

On a regular basis, MCC collaborates with non-governmental organizations, think tanks, and associations to produce public events on topics of mutual interest, such as food security and gender. Links to these examples of collaboration can be found on the events page of MCC's public website (<http://www.mcc.gov/pages/press/events>).

MCC technical and policy staff also contribute their expertise to Obama Administration development initiatives, including Partnerships for Growth, Feed the Future, and the Global Health Initiative. Many of the aid effectiveness principles fundamental to MCC's approach, such as country ownership and focus on results, are emerging as priorities in these initiatives.

3.2.2 Innovative Methods to Increase Collaboration

MCC is currently considering how it can implement some or all of the following enhancements to MCC's existing collaboration efforts:

- ★ **Data collaboration platform**—MCC will consider whether it can further enhance the public's use of the data made available on MCC's public website by offering a research collaboration platform that allows users to post the results of their work with any MCC data, comment on one another's analyses, and respond to posted research questions. This functionality would allow the public not only to test and manipulate the data, but also to engage in conversation via discussion and comment boards about the various results.
- ★ **MCC's 'Principles into Practice' Series**—MCC established the Series to offer a frank look at what it takes to make MCC's core development principles operational. The series provides a systematic way for MCC to catalog lessons learned and to convene discussions with interagency and other global development partners about what it takes to make MCC's core principles operational. The experiences captured in this series inform MCC's ongoing efforts to refine and strengthen its own model, and also allow other development professionals and organizations to benefit from and build on the lessons MCC has learned through events and discussions supporting the papers in the Principles Into Practice series. In implementation of President Obama's Global Development Policy, which emphasizes many of the same principles at the core of MCC's model, MCC also hopes the series will continue to allow others to benefit from and build on MCC's lessons.
- ★ **SharePoint's collaboration features**—MCC uses SharePoint in its day-to-day internal operations for collaboration and other functions. This includes a "collaboration zone" that allows MCC staff to interact with non-cleared business partners (for example, staff of the MCA entities, who do not have clearance for full access to MCC's information technology system, but with whom MCC staff must interact

daily); through this collaboration zone, documents and data can more easily be shared and worked on jointly. MCC will continue to enhance the usability of this and other collaboration approaches.

3.3 *MCC's 2012 Open Government Initiatives*

MCC is committed to transparency and openness, and is undertaking a variety of efforts to ensure that information related to MCC programs and activities is shared with stakeholders and the public at large. Over the next two years, MCC will undertake four initiatives that will improve public access to MCC programs; policies and operations; provide more in-depth information related to program activities and funding; and give the public access to evaluations of MCC's work on the ground. MCC's flagship initiative is centered on improving MCC's online presence to increase access to MCC data and information about the Agency and its operations.

Through these four initiatives, focused on maximum data transparency and an enhanced online presence, MCC aims to be a leader on domestic aid transparency efforts such as *Data.gov* and the Foreign Assistance Dashboard, and international efforts such as the International Aid Transparency Index. MCC will achieve this goal by providing more regular automated data uploading to the MCC public website and external aid data dashboards. In addition, MCC will focus on making data more interactive, giving consumers the ability to delve more deeply into the details of the data sets that interest them. MCC plans to present data in a way that is more collaborative; facilitating connections between data sets, for example, to demonstrate impacts to one set of data as another set changes.

3.3.1 **Flagship Initiative— Enhanced Online Presence by the End of FY 2014**

MCC has selected a project to enhance the Agency's online presence as its flagship initiative. The goals of this flagship initiative are to:

- ★ Improve transparency to MCC stakeholders on MCC's programs and results;
- ★ Provide information to the public about how MCC's investments are benefitting poor people in partner countries around the world and the American people;
- ★ Make the Agency's data more clear and accessible, and easy to use; and
- ★ Ensure that the Agency's public information exchanges are more interactive.

MCC plans to begin this flagship initiative with an independent assessment of the existing content on both the public website and content made available through social media, and the readiness of data made available online. This assessment will incorporate transparency best practices and knowledge from across the industry. This phase will end with delivery of a strategy for MCC's online presence by the **end of the second quarter of FY 2013**.

In the next phase, MCC will develop website enhancements guided by the assessment findings and the online presence strategy. Possible areas of improvement include: (i) a re-visualized results section that translates MCC data into easier-to-access; (ii) a cleaner, more interactive display of MCC's global portfolio structure; and (iii) addition of the necessary information architecture foundations for geo-coding MCC activities. This phase also would include a content audit with improved mapping, better page design,

and usability testing and interface validation, all aimed at increasing transparency and usability of data. Completion of this phase is expected by the **end of FY 2013**.

The final phase will implement the full online presence and include training for Agency staff on more effective content management techniques, as well as training for Web managers on automation improvements for better management, consistency and more current content available on or through the public website. This phase is expected to be completed by the **end of FY 2014**.

3.3.2 Leadership in Domestic and International Data Transparency Effort by the End of FY 2013

As mentioned above, MCC was the first Agency beyond USAID and the Department of State to add data to the Foreign Assistance Dashboard and the first Agency to publish obligation and disbursement data. Going forward, MCC will continue to provide quarterly financial data to the Dashboard team, but also strive for greater performance and leadership on the Dashboard by submitting descriptions of program activities for compact projects by the end of FY 2013.

MCC's approach to transparency was recognized in the 2011 Publish What You Fund Transparency Index, in which MCC scores first among all U.S. Government agencies, and seventh out of 58 donor countries and agencies globally. These efforts position MCC well to comply with USG commitments under the International Aid Transparency Initiative (IATI), to which the USG became a signatory in December 2011. Going forward, MCC will strive for greater performance and leadership in meeting international aid transparency standards by meeting the aid transparency spirit of the IATI standard and incorporating the IATI standard into MCC's preparation and publication of data per USG guidance.

3.3.3 Impact Evaluation Survey Dataset Initiative by the End of FY 2014

MCC holds itself to a high standard of evidence-based assessments of its programs' impact. The designs of MCC's impact evaluations are already available on the Agency's public website; results from the first of these evaluations have been made publicly available.

MCC is currently taking steps to make high value data sets available, including identifying a Data.gov point of contact to coordinate and manage publication of MCC data and developing a privacy protection plan. MCC is finalizing this plan which will address four issues:

1. Establish data processing anonymization protocols to be followed when anonymizing any data for public distribution;
2. Store sensitive and identifiable data in secure locations, accessible only by approved data users;
3. Establish procedures for approving data users; and
4. Establish an internal Disclosure Review Board responsible for ensuring adherence to the required processing and other privacy protection protocols.

Once the plan is cleared internally, MCC will submit the privacy protection plan to an Institutional Review Board for review and approval. When the privacy protection plan has been established, MCC plans to include 10–20 additional data sets on the Agency website and on Data.gov.³ The publication of these data is vital to ensuring the verifiability of MCC’s results to allow researchers to answer important related questions using this data, and to enable continued improvement in MCC’s survey tools by sharing them broadly through a single portal. All of these survey datasets will reflect the key principles of openness in data sharing, they will:

- ★ Be available in open formats;
- ★ Be accompanied by extensive documentation, including the original questionnaires used in conducting the surveys, enumerator, supervisor, and trainer manuals (where used), codebooks describing the datasets, and “readme” files describing the data; and
- ★ Protect the privacy of the survey respondents by not including any information that could be used to identify individual respondents.

4.3.1 Website Redesign by the End of FY 2014

Part of MCC’s online presence includes a complete analysis of mcc.gov that is aimed at an improved website information architecture developed through extensive usability testing and the creation of new content using data visualization. It may include the implementation of a website interface optimized for viewing on multiple devices (tablets, smartphones, PCs), and will also consider integrating specific code techniques to make the website’s design “responsive,” allowing for a much better browsing experience on mobile devices. MCC’s goal is to launch the new website by the end of FY 2014.

4.1 *Building a Successful Initiative*

Earlier challenges to MCC’s flagship initiative included underestimating the amount of time required for MCC’s small staff to publish numerous data sets and to perform necessary clean-up of survey data to protect the identity of specific respondents. In the 2012 OGP, MCC is taking these lessons into account.

To ensure successful accomplishment of the 2012 flagship initiative, MCC senior leadership is engaged in managing its various phases, including the initial assessment, design, and implementation of the online presence enhancements. In addition, as mentioned above, the Agency’s transparency working group will continue to participate in the on-line presence initiative and help to ensure that transparency is increasing through appropriate specific activities. Finally, because of our small staff size, MCC will consider adding one or two dedicated staff members to support the on-line presence initiative. This addition will help to ensure adequate “bandwidth” to institutionalize the transparency activities. These staff will develop and implement the ongoing processes needed for continued transparency activities. They also will facilitate communications across the MCC organization related to on-line presence activities.

³ The exact number of datasets may vary as program implementation plans change or collection and cleaning of the underlying survey data is adjusted.

4.2 Public and Agency Involvement in Preparing MCC's Open Government Plan

The draft 2012 OGP was circulated to Agency staff for input in late May, and a brownbag to solicit feedback to the plan was subsequently held. The implementation of the plan will take into account the observations and recommendations made at the brownbag session.

In addition, in order to take a more critical look at MCC's transparency performance to date, to encourage an outside perspective on how MCC could strengthen efforts to be a global leader in openness and aid transparency, and to solicit external feedback in the development of MCC's OGP, MCC leadership asked Publish What You Fund (the NGO that developed the 2011 pilot index on aid transparency) to conduct a presentation for all MCC staff on what it would take, from the Fund's perspective, for MCC to improve transparency efforts and increasingly be a global leader on transparent aid. The presentation took place on April 26, 2012 and provided a valuable external perspective that is incorporated into MCC's 2012 OGP.

MCC is grateful to those who took the time to reach out with their helpful feedback, and looks forward to the public and MCC staff continuing to monitor and offer suggestions on MCC's open government performance.

A final version of the plan is available on MCC's public website, <http://www.mcc.gov/open>, and MCC's internal intranet. An update to this plan, which incorporates public comment, will be submitted to OMB in September 2012. MCC will welcome ongoing public input on the plan so that it can be continually improved to maximize the openness, transparency, and collaboration that MCC employs in fulfilling its mission to reduce poverty through economic growth.

APPENDIX

Summary of Current and Planned Reports and Links to Data Available at MCC's Public Website

The following is information on MCC's current and ongoing efforts to share information about MCC.

a. Monitoring and Evaluation Data

(<http://www.mcc.gov/pages/activities/activity/monitoring-and-evaluation#activity-content-03>; <http://www.mcc.gov/pages/activities/activity/monitoring-and-evaluation#activity-content-04>)

Each MCC compact program has a monitoring and evaluation (M&E) plan that includes (i) the performance indicators and targets that will be used to quantitatively monitor progress during the life of the compact, and (ii) the overall strategy for evaluating the compact's results. Each country reports to MCC quarterly progress against the indicators included in the M&E plan. Each compact country's M&E plan and actual data against key performance indicators is posted to MCC's public website. MCC also publicly reports on results by sector in key areas (*i.e.*, agriculture) where MCC has significant investments. All of this data is updated on a quarterly basis, which is unprecedented in the international development community.

MCC's threshold country webpages are being updated to include more detailed descriptions of the program's objectives, activities, results to date, and available evaluation reports. With the recent re-launch of MCC's Threshold Program, this will be an ongoing effort with significant progress being achieved during 2012.

b. Impact Evaluations

(<http://www.mcc.gov/pages/activities/activity/impact-evaluation>)

In addition to M&E data, MCC makes public its portfolio of ongoing impact evaluations and the results of impact evaluations that have been completed. As an integral part of its focus on results, MCC hires independent researchers to conduct impact evaluations of its programs. These rigorous assessments of project results often enhance the design of programs, provide critical information regarding the performance of specific activities, and contribute to a broader understanding of development effectiveness. MCC publishes descriptions, methodologies, and timelines of the evaluations in progress; final reports; and summaries of the results of completed evaluations. As noted above, MCC has made three datasets from impact evaluations available on its public website, and will make more available as data is compiled. The data will allow academic researchers to test, verify, and validate MCC's evaluation methods and conclusions.

c. Program Results (<http://www.mcc.gov/results>)

To enhance accessibility of quantitative data and qualitative information available on MCC's public website, MCC created a results section. This section provides users a one-stop resource that compiles results as they emerge at every stage of MCC's poverty reduction programs worldwide.

Throughout threshold programs, MCC plans to post regular results reporting on website. For some threshold programs, MCC will conduct independent impact evaluations once the program concludes.

d. Economic Rate of Return (ERR) Analyses (<http://www.mcc.gov/err>)

Spreadsheets showing ERRs for the compacts that have entered into force are posted on MCC's public website. Excel spreadsheets allow the public to see the estimated costs and benefits of projects at the time of MCC's investment decision. To make the spreadsheets more interactive and instructive, MCC included a feature that allows users to change a few parameters in a model and see the effects on a project's ERR. MCC will continue to post spreadsheets showing ERRs for new compacts and re-scoped projects as they become available.

e. Beneficiary Analyses

(<http://www.mcc.gov/pages/activities/activity/beneficiary-analysis>)

MCC conducts beneficiary analyses to show the expected distribution of benefits among sub-populations for each compact project. Beneficiary analysis is most commonly used to estimate the impact of projects on the poor, but it has broader applicability for determining impact on populations of particular interest, such as women, the aged, children, and regional or ethnic sub-populations. MCC is in the process of posting these analyses on its public website.

f. Constraints Analyses

(Malawi: http://www.mca-m.gov.mw/constraint_analysis.pdf;

Moldova: <http://mca.gov.md/?site=0>)

MCC's compact partner countries conduct constraints analyses to identify the principle factors constraining growth and poverty reduction in their respective economies. Building on MCC's emphasis on transparency, a number of countries have posted constraints analyses on their public websites. MCC is working on developing a dedicated section of its public website to provide centralized links to country partners' constraints analyses.

g. Program Procurements

Almost all compact activities require execution by private firms. To increase the quality and quantity of bidders on compact-funded contracts, MCC enhanced the procurement section of its public website with detailed guidance on procurement processes. MCC also requires Millennium Challenge Account (MCA) entities (the partner country entities implementing MCC compacts) to publish bid challenge procedures on their websites and to publish contract notices in multiple sources (e.g., newspapers). Further, MCC consolidates these notices of open, planned, and awarded contracts into an online one-stop-shop for potential bidders. The contract award data available at the online one-stop-shop are transparent to the depth of contractor name, amount, and other details, which, among other benefits, facilitates subcontracting by small businesses. Few other bilateral and multilateral donors match this level of transparency in program procurement.

h. Country Selection Information

Countries are selected as eligible for MCC funding based on their commitment to good governance, economic freedom, and investments in their citizens. A country's policy performance in these areas is assessed primarily by 20 independent, quantitative indicators from third-party sources that are made public and displayed on country "scorecards." Scorecards for all candidate countries (as well as those countries that meet the income parameters for candidacy but are statutorily restricted from receiving U.S. development assistance) are released each year around November and are posted on MCC's public website.^{4[1]} The published scorecards are also provided to MCC's Board of Directors for their consideration when determining which countries will be eligible for MCC assistance.

In addition, MCC publishes on its public website a detailed description of the indicators and their individual methodologies, as well as the complete datasets for the current year and a dataset of historical time-series data. MCC invites public comment on the criteria and methodology that the Agency uses to rank countries' performance, and these comments are subsequently published on MCC's public website.

MCC uses third-party indicators that are publicly available, and many sources provide narrative or other explanations that describe why a country receives its score on a particular indicator. MCC encourages and provides tools for countries to investigate how they are being measured by the indicator institutions, which has enabled conversations about policy reform and data quality improvements. Future efforts will focus on ways in which MCC's annual report on selection criteria and methodology might clarify how supplemental information is used to complement the 20 indicator scorecard for country selection.

i. CEO Semiannual Report to Congress (<http://www.mcc.gov/reports>)

The CEO semiannual report to Congress on the proposed use of funds appropriated to MCC is submitted twice a year, generally in May and November. The document has six sections:

1. **Fund Summary:** Provides a high level overview of quarterly, yearly, and cumulative obligations and disbursements by fund type.

⁴ Since fiscal year 2009, scorecards have been made available in multiple languages.

2. **Compact and Compact Related:** Provides a detailed look at obligations and disbursements of compact and compact related funds by year since inception and projected out by as many as five years.
3. **Compact Overview:** Provides a detailed description of compact projects and activities by country and shows compact disbursements and obligations by project, along with any significant accomplishments of the compact.
4. **Compacts in Development:** High-level overview of potential compacts that includes estimated funding for the compact program, the status of compact development, and targeted signing date.
5. **Threshold Program Countries:** Provides historical and projected obligation and disbursement numbers by country for all threshold program funding.
6. **Use of Administrative Expense Funds:** Provides past and projected administrative obligation numbers by year for various administrative expenses.

The semiannual reports to Congress are available to the public on request and their contents are largely reflected in MCC's annual report, which is also publicly available. These reports can be found on MCC's [*"Reports & Notifications"*](#) webpage.

a. MCA Websites

MCC requires that each compact country, through the MCA entity implementing the compact, establish and maintain a public website that provides information on all aspects of the compact program. Through these websites, citizens of MCC partner countries have access to information on project plans, procurements, consultations, events, and disbursements, among other things. This real-time, detailed information provides citizens unique access to their country's development initiatives and is a critical tool in holding the government accountable to the people. Links to the MCA websites are provided through MCC's public website.

b. Anti-Fraud and Corruption Initiative

In 2009, MCC approved its Policy on Preventing, Detecting, and Remediating Corruption and Fraud in MCC Operations (Anti-Fraud and Corruption Policy). This policy includes actions that MCC has taken to enhance its capacity to prevent, detect, and remediate instances of fraud and corruption, including compact-specific fraud and corruption risk assessments. These assessments are developed to identify specific risks of fraud and corruption for each compact based on the unique projects, institutional, and country contexts.

As of February 2012, training on awareness and prevention of fraud and corruption has been provided in twelve countries. As a result of this training and related work in compact countries, five anti-fraud and corruption action plans have been completed by local MCAs, approved by MCC and the relevant MCA Boards of Directors, and posted on MCA websites. Additional action plans are being developed and reviewed.

c. Beneficiaries' Stories (<http://www.mcc.gov/success>)

In addition to publishing key data sets, MCC publishes success stories twice a month that demonstrate the human impact results of its programs in the lives of poor individuals and communities.

